

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	CRIMINAL NO. _____
v.	:	DATE FILED: _____
GWENDA BROWN	:	VIOLATIONS:
	:	18 U.S.C. §§ 1028(a)(7)(identity theft - 1
	:	count)
	:	18 U.S.C. § 1029(a)(2) (access device
	:	fraud - 1 count)
		Notice of forfeiture

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

From on or about February 26, 2002 through in or about October 2003, in the Eastern District of Pennsylvania and elsewhere, defendant

GWENDA BROWN

knowingly and without lawful authority used a means of identification of another person with the intent to commit a violation of federal law, that is, access device fraud, in violation of Title 18, United States Code, Section 1029(a)(2), by using the social security number of “RH” to apply for and receive a credit card from GAP Corporation, and thereafter used that card to obtain merchandise and other things of value aggregating \$1,000 or more, that is, approximately \$1,490.85, in

a one-year period and thereby affected interstate commerce.

In violation of Title 18, United States Code, Sections 1028(a)(7), (b)(1)(D), and (c)(3)(A).

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

From on or about February 26, 2002 through in or about October 2003,
in the Eastern District of Pennsylvania and elsewhere, defendant

GWENDA BROWN

knowingly and with intent to defraud used an unauthorized access device, namely a GAP credit card, in the name of an individual identified as “RH,” to obtain things of value aggregating \$1,000 or more during a one-year period for a total of \$ 1,490.85, thereby affecting interstate commerce.

In violation of Title 18, United States Code, Section 1029(a)(2).

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

1. As a result of the violations of Title 18, United States Code, Sections 1028(a)(7) and 1029(a)(2), as charged in this indictment, defendant

GWENDA BROWN

shall forfeit to the United States property that constitutes, or is derived from, proceeds obtained directly or indirectly from the commission of such offenses, including, but not limited to the sum of \$1,490.85. ;

2. If any of the property subject to forfeiture as a result of any act or omissions

of the defendant:

omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;

- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the property described above.

In violation of Title 18, United States Code, Section 982(a)(2).

A TRUE BILL:

GRAND JURY FOREPERSON

**PATRICK L. MEEHAN
UNITED STATES ATTORNEY**

